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August 21, 2020

VIA ECF

The Honorable John G. Koeltl, United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Application granted.
SO ORDERED.

/s/ John G. Koeltl

New York, NY

John G. Koeltl

August 21, 2020

U.S.D.J.

Re: The Legacy Agency, Inc. v. Brodie Scoffield et al., No. 1:20-cv-5771 (JGK)

Dear Judge Koeltl:

On behalf of the Major League Baseball Players Association (“MLBPA”), counsel writes (i) to seek leave to file a brief *amicus curiae* in support of the Verified Petition to Confirm the arbitration award at issue in the above-captioned matter, a motion to which all parties have consented, and (ii) to seek leave to file its brief with certain redactions, pursuant to the Court’s order dated August 17, 2020, which was electronically docketed on August 18, 2020 (Doc. 18).

Motion for Leave to File Brief Amicus Curiae. MLBPA is the exclusive representative of Players in Major League Baseball (“MLB”) under section 9 of the National Labor Relations Act (“NLRA”), 28 U.S.C. § 159(a). MLBPA has delegated a portion of its exclusive representational authority to Agents that it certifies and regulates under the MLBPA Regulations Governing Player Agents. *See, e.g., Collins v. National Basketball Players’ Ass’n*, 450 F. Supp. 1468, 1475 (D. Colo. 1991), *aff’d*, 976 F.2d 740 (10th Cir. 1992). This case involves competing applications to confirm and vacate an arbitral award. The arbitration was conducted under the MLBPA’s regulations and involves Player Agents certified by MLBPA. In the award, the Arbitrator interprets and applies the MLBPA Regulations. For both reasons, MLBPA has a strong interest in this case, and the parties have consented to its filing of a brief.

Motion for Leave to File Brief With Redactions. This Court granted the parties’ request that certain documents filed be placed under seal or filed in redacted form. *See* Doc. 18. It also granted the parties’ request that future filings be made under seal or redacted, specifically “redact[ing] any quotation of the Award or Prior Award, or any specific findings or holdings of the Award or Prior Award.” *Id.* at 3 ¶ 6. Pursuant to this Order, MLBPA seeks leave to file a redacted brief.

Wherefore, MLBPA requests that its motion for leave to file a brief *amicus curiae* and its motion to file a redacted brief be granted.

Respectfully submitted,

/s/ Eamon P. Joyce

Eamon P. Joyce